



ORGANIZATION FOR THE PROTECTION
AND ADVANCEMENT OF SMALL
TELEPHONE COMPANIES

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July 13, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

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JUL 13 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ORIGINAL
FILE

Re: In the Matter of
The Use of N11 Codes and Other
Abbreviated Dialing Arrangements
CC Docket No. 92-105

Dear Ms. Searcy:

Please find enclosed for filing the original and eleven copies of the Organization for the Protection and Advancement of Small Telephone Companies' reply comments in the above-captioned proceeding.

Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Lisa M. Zaina'.

Lisa M. Zaina
General Counsel

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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CC Docket No. 92-105

REPLY COMMENTS OF
THE ORGANIZATION FOR THE PROTECTION AND
ADVANCEMENT OF SMALL TELEPHONE COMPANIES

OPASTCO
2000 K Street, NW
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July 13, 1992

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
The Use of N11 Codes and Other)	CC Docket No. 92-105
Abbreviated Dialing Arrangements)	

**REPLY COMMENTS OF
THE ORGANIZATION FOR THE PROTECTION AND
ADVANCEMENT OF SMALL TELEPHONE COMPANIES**

I. INTRODUCTION

The Federal Communications Commission (FCC or Commission) issued a Notice of Proposed Rulemaking (NPRM)¹ inviting comments on proposed rule changes that would require local exchange carriers (LECs) to provide abbreviated dialing arrangements for certain uses. The impetus for this NPRM is a request from BellSouth Corporation asking the Commission to declare that its assignment of certain three-digit codes pursuant to a request from Cox Enterprises, Inc. would be consistent with the Communications Act of 1934 and certain Commission policies.

The Organization for the Protection and Advancement of Small Telephone Companies (OPASTCO) is a national trade association of more than 400 independently owned and operated telephone companies serving rural areas of the United States. Our members,

¹ The Use of N11 Codes and Other Abbreviated Dialing Arrangements, Notice of Proposed Rulemaking, CC Docket No. 92-105, May 6, 1992.

which include both commercial companies and cooperatives, range in size from less than 100 to nearly 50,000 access lines and together serve more than two million customers. OPASTCO is very interested in this proceeding and the effects that it will have on its members and their customers and is hereby filing its reply comments in the above-captioned proceeding.

II. COMMENTS

OPASTCO has reviewed the FCC's proposal and comments filed by interested parties in the above-captioned proceeding and has a few observations. There are definitely some areas of concern for small companies within the framework of the Commission's proposal.

The National Telephone Cooperative Association (NTCA) states that it opposes the Commission's proposed rule on the grounds that there is no basis upon which the "... Commission could conclude that it is in the public interest..."² OPASTCO concurs with this sentiment. Moreover, OPASTCO believes that the proposal may be counter to the public interest in rural areas.

The Commission asks whether codes such as 611 and 811 should be made available for abbreviated dialing even in those areas where a LEC uses them for other purposes.³ The United States Telephone Association (USTA) correctly points out that "some LECs use more N11 codes for local network-related activities to

²NTCA Comments at p. 1.

³NPRM at para. 12.

support basic service than the Commission contemplates."⁴ Many of OPASTCO's members provide customer services via N11 codes today, and they are concerned about the potential loss of 611 and 811 for customer service. LECs can much more easily route calls to repair service, the business office, and directory assistance over intracompany facilities if the customer dials N11. In those areas where intraLATA competition exists this capability is even more critical, since N11 is the only way to allow the LECs' customers in disparate exchanges reach the business office or repair center toll-free. This use of N11 keeps the cost of local service to a minimum as it allows the LECs to make best use of their networks. Thus, the loss of N11 for such purposes may result in increased costs.

Another concern for the small rural LEC is that its customers may lose access to developing information services if the FCC pursues the proposed abbreviated dialing scheme. Discussion indicates that the proposed tariffs include provisions that may make it impossible to access the new information services from outside an individual company's exchange.⁵ As

⁴USTA Comments at p. 18 (footnote omitted).

⁵This is particularly true if the FCC does not address originating and terminating access as separate issues in this proceeding. It is possible that if the terminating access were a standard seven digit number, there might not be a problem with accessing the service. Without translation of the originating N11 into a terminating standard seven digit number, many will be left without access to subscriber to the N11 abbreviated dialing. Thus it is important that the abbreviated dialing be limited to the originating access.

USTA points out, this issue is further complicated by extended area service (EAS) arrangements offered by a group of LECs in a given market.⁶ Small LECs may find that they will not have the opportunity to provide information services because the information service providers may not want to acquire additional access arrangements to serve customers outside the metropolitan areas, or outside specific exchanges in EAS-type situations. Therefore, the rural customers of small LECs may not have the access to information services that their urban counterparts or even their neighboring large company exchanges have.

There exists another problem for small LECs. N11 is a limited resource, and it will lead to customer confusion when in one exchange dialing N11 provides access, and in the next exchange dialing the same number does not provide that same access. Creation of such an environment for customers is not in the public interest. At the very least, dialing a seven or ten digit number should always be an option to access a service.

⁶USTA Comments at p. 23.

III. CONCLUSION

There are many questions attendant to the implementation of abbreviated dialing. OPASTCO urges that these questions are answered and problems solved before the FCC proceeds with this rulemaking.

Respectfully submitted



Lisa M. Zaina
General Counsel

**THE ORGANIZATION FOR THE
PROTECTION AND ADVANCEMENT
OF SMALL TELEPHONE COMPANIES**
2000 K Street, NW
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July 13, 1992

CERTIFICATE OF SERVICE

I, Matthew L. Dosch, hereby certify that a copy of OPASTCO's reply comments was sent on this, the 13th day of July, 1992, by first class United States mail, postage prepaid, to those listed on the attached sheets.

A handwritten signature in black ink, appearing to read "Matthew L. Dosch", is written over a horizontal line.

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